Nos. 79-1809 and 79-1810

In the Supreme Court of the United States

October Term, 1979

No. 79-1809

HOWARD L. MOON,
Petitioner,

vs.

ROADWAY EXPRESS, INC.,
Respondent.

No. 79-1810

MILDRED LEE ROGERS,
Petitioner,

vs.

FRITO-LAY, INC.,
Respondent.

BRIEF OF RESPONDENT FRITO-LAY, INC. IN OPPOSITION TO PETITIONS FOR WRIT OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE FIFTH CIRCUIT

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BRIEF OF RESPONDENT FRITO-LAY, INC. IN OPPOSITION TO PETITIONS FOR WRIT OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE FIFTH CIRCUIT

Respondent Frito-Lay, Inc. files this brief in opposition to the separate petitions for writ of certiorari filed on behalf of Mildred Lee Rogers (Supreme Court Docket No. 79-1810) and Howard L. Moon (Supreme Court Docket No. 79-1809), whose lawsuits against Frito-Lay, Inc. and Roadway Express, Inc., respectively, were consolidated on appeal to the United States Court of Appeals for the Fifth Circuit.

STATUTES AND REGULATORY PROVISIONS INVOLVED

Respondent Frito-Lay, Inc. submits that this case also will involve consideration of portions of 41 C.F.R. §60-741.4 (1979), which provides as follows:

> Each agency and each contractor and subcontractor shall include the following affirmative action clause in each of its covered government contracts or subcontracts (and modifications, renewals, or extensions thereof if not included in the original contract).
>
> AFFIRMATIVE ACTION FOR HANDICAPPED WORKERS
>
> (a) The contractor will not discriminate against any employee or applicant for employment because of physical or mental handicap in regard to any position for which the employee or applicant for employment is qualified. The contractor agrees to take affirmative action to employ, advance in employment and otherwise treat qualified handicapped individuals without discrimination based upon their physical or mental handicap in all employment practices such as the following: Employment, upgrading, demotion or transfer, recruitment, advertising, layoff or termination, rates of pay or other forms of compensation, and selection for training, including apprenticeship.
>
> (b) The contractor agrees to comply with the rules, regulations and relevant orders of the Secretary of Labor issued pursuant to the Act.
>
> (c) In the event of the contractor's noncompliance with the requirements of this clause, actions for noncompliance may be taken in accordance with the rules, regulations and relevant orders of the Secretary of Labor issued pursuant to the Act.

ARGUMENT

I. The Writ Should Not Be Allowed Because the Decision of the Court of Appeals for the Fifth Circuit Was Consistent With Applicable Decisions of This Court.

Both petitioners have argued that this Court should exercise its discretionary power to review the judgment of the Fifth Circuit in this case because that judgment purportedly decided a federal question in a manner that conflicts with applicable decisions of this Court. Specifically, each petitioner contends that the Fifth Circuit departed from the standards established by this Court for determining when to imply a private cause of action from a federal statute that does not expressly authorize private lawsuits. *See, e.g., Cannon v. University of Chicago*, 441 U.S. 677 (1979) (hereafter, *Cannon*); *Cort v. Ash*, 422 U.S. 66 (1975). The Court of Appeals for the Fifth Circuit specifically considered those decisions, as well as other opinions of this Court on the implication issue,[1] and Frito-Lay, Inc. submits that the judgment below was consistent with the precedent of this Court available at the time of that decision and, indeed, is consistent with this Court's most recent decision involving an implication issue, *Kissinger v. Reporters' Committee for Freedom of the Press*, 100 S. Ct. 960 (1980).

The decision in *Cort v. Ash* marked a watershed in this Court's approach to the implication of private causes of

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1. *E.g., Transamerica Mortgage Advisors, Inc. v. Lewis*, 100 S. Ct. 242 (1979); *Touche Ross & Co. v. Redington*, 442 U.S. 560 (1979); *Piper v. Chris-Craft Industries, Inc.*, 430 U.S. 1 (1977); *Securities Investor Protection Corp. v. Barbour*, 421 U.S. 412 (1975); *National Railroad Passenger Corp. v. National Association of Railroad Passengers*, 414 U.S. 453 (1974) (hereinafter *Amtrak*).

action from statutory provisions. As Justice Stevens wrote in *Cannon*:

> As our recent cases - particularly *Cort v. Ash*, 422 U.S. 66 - demonstrate, the fact that a federal statute has been violated and some person harmed does not automatically give rise to a private cause of action in favor of that person. Instead, before concluding that Congress intended to make a remedy available to a special class of litigants, a court must carefully analyze the four factors that *Cort* identifies as indicative of such an intent.

441 U.S. at 688. The need to consider carefully whether Congress intended the courts by implication to make a private cause of action available was well recognized by the court below, which undertook a detailed analysis of the four factors listed in *Cort*. Petitioners' effort to discern some conflict between the decision of the court of appeals and applicable decisions of this Court thus rests not upon the methodology chosen by the court below, but rather upon the fact that the court of appeals' conclusion - that there is no implied private cause of action under the Rehabilitation Act of 1973, 29 U.S.C. §793 (1975) - differs from the result in *Cannon*, where a private cause of action was implied under §901 of Title IX of the Education Amendments of 1972, 20 U.S.C. §1681 (1978). As the reasoning of the majority opinion in the court of appeals demonstrates, the different result is warranted by the important differences in the language of the statutes at issue and in the legislative history surrounding their enactment and any relevant amendments.

The conclusion in *Cannon* that there should be a private cause of action under §901 of Title IX turned upon a series of unique factors. *Cannon* emphasized, for example, the importance of the language of the statute itself in de-

termining whether a class benefited by a federal law is also intended to receive a federal right. 441 U.S. at 688-89. Indeed, *Cannon* recognizes that "the right- or duty-creating language of the statute has generally been the most accurate indicator of the propriety of implication of a cause of action." *Id.* at 690 n.13. The key language in Title IX fits precisely the phrasing typically found in statutes that warrant an implied private cause of action: "No person . . . shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving Federal financial assistance." 20 U.S.C. §1681 (1978). In contrast, §503 of the Rehabilitation Act of 1973 does not use similar language creating a right in any person.[2] Instead, it speaks of a requirement that federal contracts "shall contain a provision requiring that, in employing persons to carry out such contract the party contracting with the United States shall take affirmative action to employ and advance in employment qualified handicapped individuals . . . ." 29 U.S.C. §793(a). Instead of creating a personal right, this statute imposes a duty on the President to assure, through appropriate implementing regulations, that certain federal contracts contain provisions that would impose on federal contractors, as a matter of contract, an affirmative action duty with respect to hiring qualified handicapped individuals to perform the contract. A handicapped individual who believes that a federal contractor has breached this contract obligation is expressly authorized to file a complaint with the Department of Labor, which will be charged with enforcing the

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2. This Court already has noted the distinction between an "affirmative action" obligation and the language of §504 of the Rehabilitation Act of 1973, which prohibits discrimination against qualified handicapped persons in federally assisted programs in language that parallels §901 of Title IX. *See Southeastern Community College v. Davis*, 442 U.S. 397, 410-11 (1979).

contract if its investigation of the complaint shows a breach of the contractor's obligations. *See* 29 U.S.C. §793(b).

This Court's opinions in other recent cases confirm that the court below correctly relied upon this distinction between the language of the statutes at issue in this case and in *Cannon*. Thus, in *Touche Ross & Co. v. Redington*, 442 U.S. 560 (1979), this Court noted that the statute [§17(a) of the Securities Exchange Act, 15 U.S.C. §78q(a) (1971)] was "a simple directive," rather than a direct prohibition of certain conduct by the proposed defendants. In *Transamerica Mortgage Advisors, Inc. v. Lewis*, 100 S. Ct. 242 (1979), the statute [§206 of the Investment Advisors Act of 1940, 15 U.S.C. §80b-6 (1971)] also merely proscribed certain conduct but did not create or alter any civil liabilities. Again, in *Kissinger v. Reporters' Committee for Freedom of the Press*, 100 S. Ct. 960 (1980), the language of the Federal Records Act of 1950, 44 U.S.C. §2901 *et seq.* (1969), was addressed to the federal agency heads and imposed on them a duty to establish a "records management program."

Petitioners contend that, even though the language of §503 does not fit the pattern of the typical "right-creating" statute and does not expressly prohibit discrimination, there is an anti-discrimination component built into the statute.[3] Yet, neither the regulations nor the legislative history of the statute define or specify this component. See discussion by the Court below, *Rogers v. Frito-Lay, Inc.*, 611 F. 2d 1074, 1079 n.5. In view of Congress' simultaneous passage of §504, which is an express prohibition of discrimination under federally assisted programs, it is apparent that the primary purpose of §503 is not to prohibit or redress discrimination, but only to spur federal con-

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3. The affirmative action clause that is to be included in these contracts expressly prohibits discrimination against the handicapped. *See* 41 C.F.R. §60-741.4 (1978).

tractors to employ the handicapped through the inclusion of an affirmative action provision in their contracts.

In the unlikely event that this Court should find that §503 does confer special benefits upon the handicapped, *see Anderson v. Erie Lackawanna Rwy. Co.*, 468 F. Supp. 934 (E.D. Ohio 1979), the allowance of private rights of action to enforce these benefits is a different question, as this Court's opinion in *Transamerica Mortgage Advisors* illustrates. Recent decisions of this Court have held that even a clear "remedial" purpose of a statute does not require the implication of a cause of action. The mere fact that §503 may have been intended to protect the handicapped in their employment "does not require the implication of a private damage action in their behalf." *Touche Ross & Co. v. Redington,* 442 U.S. at 578. The recent opinions of this Court emphasize that the "ultimate question" in these cases is one of congressional intent. *Id.* Therefore, even the potential satisfaction of the first *Cort* factor would not warrant the implication of a cause of action if the congressional intent was to the contrary.

The dispositive factor in the *Cort* analysis is the determination of congressional intent to create, either explicitly or implicitly, a private cause of action. Since, by its terms, §503 does not create a private cause of action, congressional intent as gleaned from the legislative history of the statute may be used to supplement the implications about that intent that may be apparent from the language of the statute itself. *Transamerica Mortgage Advisors, Inc. v. Lewis,* 100 S. Ct. at 249. *See Cannon,* 441 U.S. at 694. In *Cannon* this Court based its affirmative finding of congressional intent almost solely upon a previous interpretation of §601 of Title XI of the Civil Rights Act of 1964, 42 U.S.C. §2000d (1974), on which §901 of Title IX of the Education Act Amendments of 1972 was modeled. When Congress added §901 in 1972, many courts

of appeal had held that a private cause of action should be implied under §601 of Title VI of the Civil Rights Act of 1964. *Cannon*, 441 U.S. at 696 & nn.20 & 21. The Court in *Cannon* stated that, because it is "appropriate to assume that our elected representatives . . . know the law", *id.*, at 696-7, Congress must have intended that Title IX should be enforced in the same manner as Title VI and therefore a private cause of action should be implied under Title IX.

The only clear parallel to the language of §503(a) is the affirmative action directive found in Executive Order 11246, promulgated in 1966, and its predecessor, Executive Order 10925, promulgated in 1961. As the court below noted, 611 F.2d at 1083, by 1973, when Congress passed the Rehabilitation Act, courts of appeal already had held that there could be no implied private cause of action under these Executive Orders. *Farmer v. Philadelphia Electric Co.*, 329 F.2d 3 (3d Cir. 1964); *Farkes v. Texas Instrument, Inc.*, 375 F.2d 629 (5th Cir.), *cert. denied*, 389 U.S. 977 (1967). If Congress indeed is presumed to know the law, it then knew in 1973 not to expect a court to imply private causes of action in favor of individuals who contend that a contractor has breached an affirmative action clause in its contract with the federal government.[4]

Instead of supporting petitioners' view that Congress intended a private cause of action under §503, the 1978 amendments argue the opposite conclusion. Whatever may

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4. Congress may also be presumed to have been aware that the courts had not permitted private actions by persons claiming as third party beneficiaries under federal contracts that affected the terms and conditions under which they were employed, *see, e.g., United States v. Lovknit Mfg. Co.*, 189 F.2d 454 (5th Cir.), *cert. denied*, 342 U.S. 896 (1951), and of the general hesitancy of the lower courts to imply private causes of action to enforce federal laws that regulate employers, *e.g., Jeter v. St. Regis Paper Co.*, 507 F.2d 973 (5th Cir. 1975); *Martinez v. Behring's Bearings Service, Inc.*, 501 F.2d 104 (5th Cir. 1974); *Breitwieser v. KMS Industries, Inc.*, 467 F.2d 1391 (5th Cir. 1972), *cert. denied*, 410 U.S. 969 (1973).

be the view of the committees responsible for the 1978 amendments, the fact remains that Congress as a whole created two express causes of action to enforce the provisions of §§501 and 504 of the Rehabilitation Act but, despite the split in opinion among district courts that, by then, had considered the implication question under §503,[5] provided no express private remedy for §503.[6] This omission by Congress at the time of the 1978 amendments is especially significant in view of the repeated efforts of proponents of a private cause of action for the handicapped to obtain some express cause of action[7] and the more restrictive approach of this Court to implying a private cause of action illustrated by *Cort v. Ash* itself and *Securities Investor Protection Corp. v. Barbour*, 421 U.S. 412 (1975). When Congress did amend to deal expressly with private causes of action under the Rehabilitation Act, nothing was done about §503 - despite the Senate's recognition, at least, that its reason for amending §501 was to make "specific the right to bring a private right of action with respect to Section 501 . . . ." Rehabilitation, Comprehension Service

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5. See cases decided prior to 1978 listed among the cases cited in *Rogers v. Frito-Lay, Inc.*, 611 F.2d at 1085 n.1.

6. By 1978 there also had been other district court decisions that denied a private cause of action under Executive Order 11246. *E.g., Traylor v. Safeway Stores, Inc.*, 402 F. Supp. 871 (N.D. Cal. 1975).

7. For example, on September 12, 1977, the House Subcommittee on Select Education was urged to "recommend the introduction of a Bill . . . which would: 1. Create an express individual right of action before the Judiciary under Sections 501, 503 and 504 . . . ." *Hearings before the Subcomm. on Select Education of the House Comm. on Education and Labor*, 95th Cong., 1st Sess., 164 (1977) (statement of Reese H. Robrahn, on behalf of the American Council of the Blind and the American Coalition of Citizens with disabilities). Similarly, Mr. Robrahn urged that H.R. 9804 be passed to provide "a right of action for handicapped persons, eliminating the existing question as to whether such a right of action exists . . . under Sections 501 and 503 . . . ." *Hearing before the Senate Comm. on Governmental Affairs on Reorganization Plan No. 1 of 1978*, 95th Cong., 2d Sess., 450-51 (1978).

and Developmental Disabilities Act of 1978, S. Rep. No. 890, 95th Cong., 2d Sess., 19 (1978).[8]

Petitioner's other argument derived from the 1978 amendments focuses on the provisions made for an award of attorney's fees in any action "to enforce or charge a violation of this subchapter." 29 U.S.C. §794a. Because §503 is part of the subchapter, petitioners contend that this language manifests a clear intention by Congress that a private cause of action be implied under §503. Even though the House and Senate Committees may have believed that there was such a private cause of action,[9] nothing in the language of §503 or the relevant state of the law warranted that conclusion. Moreover, Congress as a whole in 1978 did not make express provisions for a §503 cause of action, as it did for §501 and §504 claims. Congress as a whole did not engage in a meaningless act by authorizing an award of attorney's fees in an action to enforce §503, for it is more consistent with the nature and language of §503(a) to conclude that private parties may have some right to judicial review of agency action taken in response to complaints filed under §503(b), 29 U.S.C. §793(b), *see* 5 U.S.C. §702, or a possible action to compel the President or the Secretary of Labor to fulfill their respective duties under the statute or to enforce the contractual obligations

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8. The efforts of those who urge a general prohibition on discrimination in employment because of handicap have been singularly unsuccessful to date. *See, e.g.*, Exhibit "A" for a partial listing of bills offered as amendments to Title VII of the Civil Rights Act of 1964, 42 U.S.C. §2000e *et seq.* These actions of Congress also suggest that Congress did not intend the courts to create under §503 a cause of action affecting employers on whom it had declined to impose a similar nondiscrimination obligation under Title VII. *Cf. Califano v. Sanders*, 430 U.S. 99 (1977) (legislative history involving amendment to 28 U.S.C. §1331 used to infer intent with respect to §10 of the Administrative Procedure Act, 5 U.S.C. §§701-706).

9. See discussion in *Rogers v. Frito-Lay, Inc.*, 611 F.2d at 1082 & nn.9 & 10.

requiring affirmative action, *see* 5 U.S.C. §§704; 701(a)(2); 706(1). An award of attorney's fees could then be made in such actions to enforce §503.

Finally, the express provision in §503(b) of the Rehabilitation Act, 29 U.S.C. §793(b), for an administrative complaint procedure offers two further arguments in support of the result reached in the court of appeals. First, as that court noted, the inclusion of such an express remedial provision supports the view that Congress did not intend a private cause of action. 611 F.2d at 1084-85. The court of appeals' conclusion that there is continued vitality to the ancient maxim of statutory construction, *expressio unius est exclusio alterius,* is consistent with the decisions of this Court. *E.g., Kissinger v. Reporters' Committee for Freedom of the Press,* 100 S. Ct. at 968; *Transamerica Mortgage Advisors, Inc. v. Lewis,* 100 S. Ct. at 247; *National Railroad Passenger Corp. v. National Association of Railroad Passengers,* 414 U.S. 453, 458 (1974).

Second, the implication of a private cause of action would interfere with and disrupt the legislative enforcement scheme for §503, for at least four reasons:

(1) The remedies provided in the statute and regulations are adequate without private lawsuits. The regulations specify several means by which the agency can enforce the contract provisions, including use of judicial action. A complainant can request review by the director of the agency if dissatisfied with agency action, 41 C.F.R. §60-741.26(g)(1). Neither petitioner in this case requested such a review before filing suit.

(2) Section 503, a simple directive to agencies to include affirmative action provisions in their contracts, is in pursuit of a benign social policy to increase employment opportunities for qualified handicapped individuals. It does not demonstrate any intention to impose liability on

federal contractors that goes beyond the contract liability specified in the regulations. *Wood v. Diamond State Telephone Co.*, 440 F. Supp. 1003, 1009 (D. Del. 1977).

(3) A private cause of action would impede the regulations' requirement of informal pre-enforcement efforts at "conciliation and persuasion". 41 C.F.R. §60-741.26. Private litigation could negate and supplant the OFCCP's efforts to evaluate claims by pressuring corporate defendants into settlements. Inconsistent judgments in private suits would also interfere with the orderly development of enforcement precedent and would hamper the OFCCP's ability to give authoritative advice to federal contractors.

(4) The vast number of potential claims, complications, and delays which would result from the implication of an additional private remedy would seriously threaten the statute's attempt to provide a certain level of administrative and judicial economy.

A private cause of action thus is not in harmony with the administrative remedy set forth in §503. The maxim of *expressio unius est exclusio alterius, supra,* can only be negated in the face of "clear contrary evidence of statutory intent to create an additional remedy." *Amtrak,* 414 U.S. at 458; *Anderson v. Erie Lackawanna Railway Co.,* 468 F. Supp. 934, 938 (E.D. Ohio 1979). Section 503 does not manifest such an intent, but instead supports the conclusion that Congress intended the administrative remedies to be the exclusive remedies and that the third *Cort v. Ash* factor for implying a private cause of action is not satisfied.

As can be seen from the foregoing analysis, petitioners' claims, quite unlike the *Cannon* case, are not "the atypical situation in which *all* of the circumstances that the Court

has previously identified as supportive of an implied remedy are present." *Cannon*, 441 U.S. at 717. Petitioners have failed to show that any of the factors supporting implication are satisfied as applied to §503, including the dispositive factor of congressional intent. It is obvious that there is no conflict between the decision of the court below and *Cannon*, or any other decision of this Court, and discretionary review of this matter should be denied.

II. In View of the Administrative Remedies Available to Qualified Handicapped Persons Under §503 and the Lack of Substantial Precedent or Experience With the Administrative Agency's Interpretation or Administration of This Statute, the Resolution of This Matter at This Time Is Not of Such Importance That Review by This Court Is Warranted.

A qualified handicapped person who claims a violation of §503 is provided with several remedies. If the individual complaint to the Department of Labor is rejected, the regulations adopted pursuant to §503 provide that the individual may request review of this action by the Director of OFCCP. In addition, an aggrieved person may seek review under the Administrative Procedure Act. It can hardly be said that the handicapped person is without a remedy when Congress specifically set forth administrative procedures and sanctions applicable to §503 violations. Thus, despite petitioners' appeal that the writ should issue because of the importance of this case to countless handicapped persons, those persons are not without access to any forum whatsoever to hear complaints that a contractor has failed to meet contractual obligations imposed on him by an agency acting pursuant to §503. There are many federal questions that are important to specific groups of individuals, yet that does not mean that this Court

should exercise its discretionary power to review a court of appeals' decision on certiorari.[10]

Moreover, this Court ought to await the development of additional precedent from the courts of appeal[11] and of additional decisions from the administrative agencies[12]

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10. Indeed, the question of whether there is any implied cause of action under Executive Order 11246 is a far more significant one, for the affirmative action provision of the Executive Order covers a far greater variety of persons than §503. Yet, this Court has denied a writ in such cases. *E.g., Farkas v. Texas Instruments, Inc.*, 375 F.2d 629 (5th Cir.), *cert. denied*, 389 U.S. 977 (1967).

11. The only other court of appeals decision to date on the question of whether courts should imply a private cause of action under §503 concurs in the result reached by the Fifth Circuit in this case. *See Hoopes v. Equifax, Inc.*, 611 F.2d 134 (6th Cir. 1979). Recent district court opinions have divided on this issue, and other courts of appeal may soon have the opportunity to consider these issues. *Compare, e.g., Clarke v. Felec Services, Inc.*, 22 FEP Cas. 1256 (D. Alaska 1980) (implying a private cause of action for claims since the 1978 amendments to the Rehabilitation Act of 1973), *with Coleman v. Noland Co.*, 21 FEP Cas. 1248 (W.D. Va. 1980); *Moon v. Santa Fe Ry.*, 22 FEP Cas. 1252 (D. Kan. 1980) (both denying a cause of action under §503).

One court of appeals has affirmed without opinion a decision by a district court, acting pursuant to 5 U.S.C. §706, that substantial evidence supported the Department of Labor's finding that a contractor had not discriminated against the plaintiff on the basis of handicap. *Vislisel v. Department of Labor*, 605 F.2d 1209 (8th Cir.), *aff'g*, 21 FEP Cas. 981 (N.D. Iowa 1979). Although the district court opinion that the Eighth Circuit affirmed does not mention implication of a private cause of action under §503, one of the questions presented in the plaintiff's later petition for writ of certiorari to this Court was whether there is a private cause of action. This Court denied the writ. 48 U.S.L.W. 3435 (U.S. Jan. 7, 1980).

12. Petitioners give great weight to the fact that the OFCCP has expressed its approval of the implication of a private cause of action under §503. However, OFCCP's position seems to be based solely on the desire for assistance in dealing with a current "backlog of Section 503 administrative complaints", Affidavit of Weldon J. Rougeau, Director of OFCCP, Appendix to *Rogers*, 611 F.2d at 1108, rather than any analysis of the impact of parallel judicial remedies on the conciliation and enforcement scheme established in OFCCP's regulations. This is certainly no reason to read into the statute an intent contrary to that held by the Congress which first enacted the legislation in 1973.

charged with enforcing §503 before reaching a hasty conclusion about whether, even if there is no evidence of any intention by Congress that it does not expect the courts to imply a private cause of action, implication is consistent with and an aid to the enforcement of §503.

CONCLUSION

The Court of Appeals for the Fifth Circuit rendered an opinion in this action that is consistent with the relevant decisions of this Court. Although this action involves a decision of a federal question - whether there should be a private cause of action implied directly from §503 of the Rehabilitation Act of 1973, that question is not so important nor is it so ripe for review by this Court at this time that the writ of certiorari should be issued. Accordingly, this Court should deny the petitions for a writ of certiorari to the Court of Appeals for the Fifth Circuit requested by the petitioners.

Respectfully submitted,

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EXHIBIT "A"

Unsuccessful Attempts to Amend the Civil Rights Act of 1964 to Add Handicap as a Prohibited Ground of Discrimination

93d Congress (1973-74)

Bill	Sponsor
S. 1780	Pell
H.R. 1120	Roybal
H.R. 2685	Hicks
H.R. 10960	Tiernan
H.R. 11986	Hicks & 24 others
H.R. 11987	Hicks & 10 others
H.R. 12654	O'Brien
H.R. 12916	Moakley
H.R. 13199	Hicks & 21 others
H.R. 13200	Hicks & 18 others

94th Congress (1975-76)

Bill	Sponsor
S. 1311	Pell
S. 1757	Weicker
H.R. 1346	O'Brien
H.R. 1886	Matsunaga
H.R. 2515	Hicks
H.R. 3497	Roybal
H.R. 4624	Hicks & 23 others
H.R. 4625	Hicks & 24 others
H.R. 4626	Hicks & 6 others
H.R. 5016	Hicks & 8 others
H.R. 7061	Dodd
H.R. 7754	Hicks & 3 others
H.R. 7758	Lehman
H.R. 7946	Dodd & 4 others
H.R. 8028	Beard & 19 others
H.R. 8417	Beard & 5 others
H.R. 12591	Koch

95th Congress (1977-)

Bill	Sponsor
H.R. 264	Conte
H.R. 461	Le Fante
H.R. 1107	O'Brien
H.R. 1200	Rodino
H.R. 1995	Roybal

see 7 9

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